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EXHIBIT A

VIA ELECTRONIC FILING

December 9, 2024

Hon. Andrew L. Carter, Jr.
United States District Court
Southern District of New York
Courtroom 1306
40 Foley Square
New York, NY 10007

Re: *Securities and Exchange Commission v. Harry Zhabilov, et al.*
Case no. 1:24-cv-07362-AT

Dear Judge Carter:

We represent Defendant Dannie Zhabilov (“Defendant”) in the above-referenced matter. We were formally retained by Defendant on December 9, 2024. We respectfully request a 14-day extension to respond to the Plaintiff’s Complaint up to and including December 23, 2024.

Plaintiff commenced this action and filed its Complaint on September 30, 2024. Upon information and belief, Defendant formally accepted service on November 8, 2024 (Dkt. No. 29). Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A)(i), and due to the Thanksgiving holiday, Defendant’s original deadline to answer or otherwise respond to the Complaint was December 2, 2024.

On or about December 2, 2024, attorneys Michael J. Grudberg and Robert G. Heim filed notices of appearance on behalf of Defendant (Dkt Nos. 38 and 39). In addition, attorneys Grudberg and Heim filed Defendant’s first letter motion for extension of time requesting an extension up to December 9, 2024, to file an answer (Dkt. No. 40), which was granted on December 3, 2024 (Dkt. No. 41).

Due to the recent retention of new counsel, Defendant requests an extension of time to respond to Plaintiff’s Complaint until December 23, 2024. Because this matter was recently commenced and is still in the pleading stage, Defendant respectfully submits that this extension will not affect any other deadlines or prejudice any other parties.

Plaintiff’s counsel has consented to this extension due to the above circumstances.

Hon. Andrew L. Carter, Jr.
December 9, 2024



This is Defendant's second request for an enlargement of time with respect to this action.

We thank the Court for its time and consideration.

Respectfully submitted,

LUCOSKY BROOKMAN LLP

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